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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

CHRISTIAN LOVGREN and GINA
CUNEO, on behalf of the State of
California, as private attorneys general,

Plaintiffs,

v.

ENLOE MEDICAL CENTER, a
California; and Does 1 through 50,
Inclusive,

Defendants.

Case No. 2:24-cv-01133-WBS-DMC

**JOINT STIPULATION TO SET
BRIEFING SCHEDULE ON
PLAINTIFFS' MOTION TO
REMAND CASE TO STATE COURT
AND TO STAY CASE PENDING
MEDIATION**

Judge: Hon. William B. Shubb
Courtroom: 5, 14th Floor

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12 Attorneys for Defendant

1 Plaintiffs CHRISTIAN LOVGREN and GINA CUNEO (“Plaintiffs”) and
2 Defendant ENLOE MEDICAL CENTER (“Defendant”) (collectively the “Parties”),
3 by and through their respective counsel of record, hereby stipulate and agree as
4 follows:

5 WHEREAS, on May 16, 2024, Plaintiffs filed and served their Notice of
6 Motion and Motion to Remand Case to State Court, which is set for hearing on June
7 24, 2024 (Dkt. 13);

8 WHEREAS, the Parties have agreed to participate in private mediation on
9 January 21, 2025, with experienced wage and hour mediator Steven Serratore,
10 which was his first available date that was mutually agreeable for the Parties;

11 WHEREAS, to prevent the Parties from incurring further, potentially
12 unnecessary litigation expenses, and in the interests of judicial economy and the
13 conservation of Party resources, the Parties agree that good cause exists to stay this
14 action until after the mediation set for January 21, 2025;

15 WHEREAS, if mediation is cancelled by one or more Parties, the Parties will
16 promptly notify the Court of the cancellation, the stay shall be lifted, and
17 Defendant’s Opposition to Plaintiffs’ Motion to Remand Case to State Court will be
18 due thirty (30) days after cancellation, with Plaintiffs’ Reply to Defendant’s
19 Opposition due two (2) weeks thereafter; and

20 WHEREAS, the Parties met and conferred regarding the setting of a briefing
21 schedule for Plaintiffs’ Motion to Remand Case to State Court, and the Parties have
22 agreed on the following briefing schedule:

- 23 • The hearing on Plaintiffs’ Motion to Remand Case to State Court to be
24 continued from June 24, 2024, to March 24, 2025;
- 25 • Defendant’s opposition deadline to be continued to February 4, 2025; and
- 26 • Plaintiffs’ reply deadline to be continued to February 11, 2025.

27 NOW, THEREFORE, based upon the foregoing, the Parties, by and through
28

1 their respective undersigned counsel of record, hereby stipulate and agree as
2 follows:

3 1. The above recitals are an integral part of and provide the foundation for
4 this stipulation;

5 2. This matter is stayed, including all deadlines associated therewith, until
6 after the completion of the mediation in this case;

7 3. If mediation is cancelled by one or more Parties, the Parties will
8 promptly notify the Court of the cancellation, the stay shall be lifted, and
9 Defendant's Opposition to Plaintiffs' Motion to Remand Case to State Court will be
10 due thirty (30) days after cancellation, with Plaintiffs' Reply to Defendant's
11 Opposition due two (2) weeks thereafter; and

12 4. The briefing schedule for Plaintiffs' Motion to Remand Case to State
13 Court is as follows:

14 a. The hearing on Plaintiffs' Motion to Remand Case to State Court to be
15 continued from June 24, 2024, to March 24, 2025;

16 b. Defendant's opposition deadline to be continued to February 4, 2025;
17 and

18 c. Plaintiffs' reply deadline to be continued to February 11, 2025.

19 **IT IS SO STIPULATED.**

20 *[Signatures of Following Page]*

LITTLER MENDELSON, P.C.

Dated: May 30, 2024

By: /s/ Douglas L. Ropel

Barbara Blackburn

Douglas L. Ropel

Attorney for Defendant

ENLOE MEDICAL CENTER

**BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW LLP**

Dated: May 31, 2024

By: /s/ Jeffrey S. Herman (Authorized on 5/31/2024)

Jeffrey S. Herman

Sergio Julian Puche

Trevor G. Moran

Attorney for Plaintiffs

CHRISTIAN LOVGREN and GINA CUNEO

ORDER

By stipulation of the Parties, and for good cause shown, the Court hereby Orders as follows:

1. This above-captioned action is stayed, including all deadlines associated therewith, until after the completion of the mediation in this case;

2. This matter is stayed, including all deadlines associated therewith, until after the completion of the mediation in this case;

3. The August 12, 2024 Scheduling Conference is **vacated**;

4. If mediation is cancelled by one or more Parties, the Parties will promptly notify the Court of the cancellation, the stay shall be lifted, and Defendant's Opposition to Plaintiffs' Motion to Remand Case to State Court will be due thirty (30) days after cancellation, with Plaintiffs' Reply to Defendant's Opposition due two (2) weeks thereafter; and

5. The briefing schedule for Plaintiffs' Motion to Remand Case to State Court is as follows:


a. The hearing on Plaintiffs' Motion to Remand Case to State Court to be continued from June 24, 2024, to **March 31, 2025 at 1:30pm**;

b. Defendant's opposition deadline to be continued to **February 4, 2025**; and

c. Plaintiffs' reply deadline to be continued to **February 11, 2025**.

IT IS SO ORDERED.

Dated: June 3, 2024


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE